

The Honorable Tana Lin

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

NEXON KOREA CORPORATION,  
a Korean Corporation,

Plaintiff,

v.

IRONMACE CO., LTD., a Korean  
Corporation; JU-HYUN CHOI, individually;  
and TERENCE SEUNGHA PARK,  
individually,

Defendants.

Case No. 2:23-cv-00576-TL

**DECLARATION OF  
JOHN B. DUNCAN Ph.D.**

DECLARATION OF JOHN DUNCAN Ph.D.  
No. 2:23-CV-00576-TL

43223-00002/4873916.1

**GREENBERG GLUSKER FIELDS  
CLAMAN & MACHTINGER LLP**  
2049 Century Park East, Suite 2600  
Los Angeles, California 90067  
(310) 553-3610

**DECLARATION OF JOHN B. DUNCAN, Ph.D.**

I, John B. Duncan, Ph.D., hereby declare as follows:

1. I submit this declaration in rebuttal to the Declaration of Jason Park. I am neither counsel for, related to, nor employed by any of the parties, and I have no financial or other interest in the outcome of this litigation. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to those facts under oath.

2. I am fluent in both English and Korean. I am a native speaker of English, and I received my B.A. in History from Korea University in Seoul, Korea, in 1972, where the language of instruction was Korean. I received my Ph.D. in Korean History from the University of Washington in 1988. I helped create the Center for Korean Studies at UCLA in 1989 and served as its Director beginning in 2001 until my retirement in 2019. During my teaching career, I taught advanced Korean at UCLA and guided graduate students in directed readings in Korean language sources.

3. I have translated numerous books and articles from Korean to English, and I have also written and published academic articles and newspaper columns in Korean. I have served as a Korean language courtroom interpreter in Hawaii and in Seattle and have provided consulting services on Korean language translation. Attached as Exhibit A is my abbreviated CV.

4. I have reviewed the Declaration of Jason Park, as well as the two exhibits he references in paragraph 3 of his declaration (the “Annual Salary Agreement” and “Confirmation of Rights to Business-Related Intellectual Property”).

5. The most accurate and natural translation of the phrase “본 계약과 관련하여” is “relating to this agreement,” with the word 관련하여 (gwallyeonhayeo) meaning “relating to.”

6. Mr. Park provides four “possible” translations for the phrase (but omits “relating to,” the most accurate one). Of those four possible alternatives, “in connection with this agreement” and “regarding this agreement” are reasonably accurate.

8. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

DocuSigned by:  
John Duncan Ph.D.  
9B46055F6A394F7...

# **Exhibit A**

Abbreviated version, revised October 2022

## JOHN B. DUNCAN

### EDUCATIONAL BACKGROUND

1988: Ph.D. in History, University of Washington, Seattle, Washington  
1977: M.A. in History, University of Hawaii, Honolulu, Hawaii  
1972: B.A. in History, Korea University, Seoul, Korea

### TEACHING POSITIONS

2003-2019: Professor, Department of Asian Languages and Cultures, UCLA  
1994-2003: Associate Professor, Department of East Asian Languages and Cultures, UCLA  
1993-94: Visiting Assistant Professor, Dept. of East Asian Languages and Civilizations, Harvard  
1989-93: Assistant Professor, Department of East Asian Languages and Cultures, UCLA  
1988-89: Visiting Assistant Professor of History, Boise State University  
1987-88: Lecturer, Department of History, University of Washington

### ADMINISTRATIVE POSITIONS

2000-2004: Study Center Director, Education Abroad Program at Korea University  
2001-2017: Director, Center for Korean Studies, UCLA  
2005-2008: Chair, Department of Asian Languages and Cultures, UCLA  
2015-2019: Co-chair, Inter-University Center for the Study of Advanced Academic Korean

### PUBLICATIONS

#### Books

*The Origins of the Chosŏn Dynasty* (Seattle: University of Washington Press, 2000).  
*Rethinking Confucianism: Past and Present in China, Japan, Korea, and Vietnam*, co-edited with Benjamin Elman and Herman Ooms (Asia and Pacific Monograph Series, UCLA, 2002).  
*Reform and Modernization in the Taehan Empire*, co-edited with Kim Dongno and Kim Dohyung (Seoul: Jimoondang International, 2006).  
*The Institutional Basis of Civil Governance in the Chosŏn Dynasty*, co-edited with Jungchul Lee (Seoul: Seoul Selection, 2009).  
*Chosŏn wangjo ūi kiwŏn*, (translation of *The Origins of the Chosŏn Dynasty* by Kim Bum) (Seoul: Nŏmŏ Books, 2013)  
*Imperialism in East Asia in the Nineteenth and Early Twentieth Centuries: With a Focus on the Case of Japan in Korea* (Paju, Korea: Jimmundang, 2021).

## Articles

- “The Formation of the Central Aristocracy in Early Koryŏ,” *Korean Studies* 12 (1988).
- “The Social Background to the Founding of the Chosŏn Dynasty: Change or Continuity?,” *Journal of Korean Studies* 6, 1989).
- “The Korean-American Community and the Independence Movement,” in *Han’guk tongnip undongsa ūi chae chomyŏng: haeoe hangil minjok tongnip undong ūi saeroun insik* (Seoul: Han’guk tongnip undongsa yŏn’guhoe, 1993).
- “Confucianism in the Late Koryŏ and Early Chosŏn,” *Korean Studies* 18 (1994).
- “Chosŏnjo [sarim] kaenyŏm ūi chae kŏmt’o” (A Reconsideration of the Sarim of the Chosŏn Dynasty,” *Nammyŏnghak yŏn’gu nonch’ong* 3 (1995).
- “The Emergence of the Tonghak Religion,” in Lee, Peter H., ed., *Sourcebook of Korean Tradition*, Vol. II (New York: Columbia University Press, 1996).
- “Miguk nae han’guk chŏn kŭndaesa yŏn’gu tonghyang” (Trends in American Studies of Pre-modern Korean History) *Yŏksa wa hyŏnsil* 23-3 (1997).
- “Confucian Social Values in Contemporary South Korea,” in Lewis Lancaster and Richard Payne, ed., *Religion and Contemporary Korea* (Berkeley: Asian Humanities Press, 1997).
- “The Korean Adoption of Neo-Confucianism: The Social Context,” in Walter H. Slote and George de Vos, eds., *Confucianism and the Family* (Albany: SUNY Press, 1998).
- “Proto-nationalism in Premodern Korea,” in Lee, Sang-oak and Duk-Soo Park, eds., *Perspectives on Korea* (Sydney: Wild Peony Press, 1998).
- “Han’guk t’ongil e kiyŏhanŭn Han’gukhak yŏn’gu panghyang,” in Im Chaehae, ed., *Minjok t’ongil ūl aptanginŭn kukhak* (Seoul: Jimmundang, 1998).
- “Hyanghwain: Migration and Assimilation in Chosŏn Dynasty Korea,” *Acta Koreana* 3 (July 2000).
- “The Problematic Modernity of Confucianism: The Question of Civil Society in Chosŏn Dynasty Korea,” in Charles Armstrong, ed., *Civil Society in South Korea* (Routledge, New York, 2001).
- “The Uses of Confucianism in Modern Korea,” in Benjamin Elman, John Duncan, and Hermam Ooms, eds., *Rethinking Confucianism: Past and Present in China, Japan, Korea, and Vietnam* (Asia and Pacific Monograph Series, UCLA, 2002).
- “Examinations and Orthodoxy in Chosŏn Dynasty Korea,” in Elman, Duncan, and Ooms, eds., *Rethinking Confucianism: Past and Present in China, Japan, Korea, and Vietnam* (2002).
- “Sŏyang sahak kwa Han’guk chŏn kŭndaesa,” in Han’guk sahakhoe ed., *Han’guksa yŏn’gu pangbŏp ūi saeroun mosaek* (Seoul: Kyungin munhwasa, 2003).
- “Naehun and the Politics of Gender in 15th Century Korea,” in Young-Key Kim Renaud, ed., *Korean Women in the Humanities* (M.E. Sharpe, 2003).
- “Koguryŏ in Koryŏ and Chosŏn Historical Memory,” *Journal of Inner and East Asian Studies* 1 (2004).
- “The Confucian Context of Reform,” in Kim Dongno, John Duncan, and Kim Dohyung, eds., *Reform and Modernization in the Taehan Empire* (Seoul: Jimoondang, 2006).
- “The Impact of the Hideyoshi Invasions on Ethnic Consciousness in Korea,” *Kyushu daigaku kankoku kenkyu senta nenbo* 6 (2007).
- “Imjin waeran ūi kiŏk kwa minjok ūisik ūi hyŏngsŏng” (Historical Memories of the Imjin War and the Formation of Ethnic Consciousness) in Chŏng Tuhŭi ed., *Imjin waeran: tong asia samguk chŏnjaeng* (Seoul: Humanisŭt’ŭ, 2007).
- “Some Reflections on this Special Issue about Koguryŏ’s Foreign Relations,” *Journal of Northeast Asian History* 4-1 (2007).
- “Confucianismo: el sistema tributario y las relaciones sino-coreana,” Alfredo Romero Castilla trans. *Revista de Relaciones Internacionales de la UNAM* 103 (April 2009).
- “An Earlier Age of Globalization: Koryŏ in the Yuan Empire,” in Min, Wonjung, ed., *Corea: una vision interdisciplinaria* (Santiago, Chile: Catholic University of Chile, 2010).
- “Maintaining Boundaries: The Military and Civil Branches in the Koryŏ and Early Chosŏn,” *Taiwan Journal of East Asian Studies* 8-1 (2011).

- “Foreword,” in Christopher Hanscom, Youngju Ryu and Walter Lew, eds., *Imperatives of Culture: Selected Essays on Korean History, Culture and Society from the Japanese Colonial Era* (Honolulu: University of Hawaii Press, 2013).
- “Han’guksa yŏn’guja ūi dilemma” (Dilemmas for the Historian of Korea) in Miyajima Hiroshi and Pae Hangsŏp, eds., *Tongasia nŭn myŏtsiin’ga?* (Seoul: Nomo Books, 2015).
- “The *Taehak yŏnŭi chimnyak* and the Politics of Confucian Learning in Early Chosŏn Dynasty Korea,” in Anne Cheng, ed., *Readings and Uses of the Great Learning (Daxue)* (Paris: College de France, 2016).
- “Yu Sŏngnyong kwa Chosŏn chunggi minjok ūi munje” (Yu Sŏngnyong and the Question of Nationhood in the Mid-Chosŏn), Kim Dohyung, ed., *Sŏae Yu Sŏngnyong ūi haksul kwa hyŏndae chŏk kyesŭng* (Seoul: Hyeon, 2016).
- “Chŏng Tojŏn and the Early Modern East Asian Interstate System,” in Pak Honggyu, ed., *Chŏng Tojŏn kwa Tong Asia sin chilsŏ kuch’uk* (Seoul: Ponghwa Chŏngssi munhŏn kongjŏnghoe, 2016).
- “Dealing with Empires: A Comparison of Mongol Era Koryŏ and Twentieth Century Colonial Period Intellectuals,” *Kyushu daigaku kankoku kenkyu senta nenbo* 16 (2016).
- “Estudios coreanos en Estados Unidos: implicaciones para los académicos latinoamericanos,” *Chakana: Revista Internacional de Estudios Coreanos* 1 (2017)
- “Confucianismo y la sociedad en el este de Asia: el caso de Corea,” Juan Felipe Lopez Aymes, trans. Chakana: *Revista Internacional de Estudios Coreanos* 3 (2018)
- “Koryŏ wa Chosŏn ūi pyŏnhwa mit chisoksŏng,” in Han’guk chungsesahoe, Kyŏnggi munhwa chaedan and Inch’ŏn munhwa chaedan, eds., *Koryo wangjo wa 21 segi: K’oria mirae yusan* (Seoul: Kyungin munhwasa, 2019).
- “Literary Miscellany in Korea” in Nahalie Kouame, Eric P. Meyer and Annie Viguer, eds., *Encyclopédie des historiographies : Afriques, Amériques, Asies* (Paris: *OpenEdition Books platform of Presses de l’INALCO*, 2020).
- “Yongjae ch’onghwa” in Natalie Kouame, Eric P. Meyer and Annie Viguer, eds., *Encyclopédie des historiographies : Afriques, Amériques, Asies* (Paris: *OpenEdition Books platform of Presses de l’INALCO*, 2020).
- “Estudios coreanos en Estados Unidos: implicaciones para los académicos latinoamericanos,” *Cambio de época: La República de Corea y la renovación de sus relaciones con América Latina* (Santiago, Chile: Universidad Central, 2021).
- “The Hideyoshi Invasions: Popular Memories and Ethnic Consciousness” in *To asjia to no taiwa: kunijakai o koeta chi no shusei* (Fukuoka: Shoin tosho shuppan, 2023).

## Translations

### Books

- Kang Man-gil, *A Revised History of Contemporary Korea* (London: Global Oriental Ltd., 2005).
- Kim Jung-bae et al., *A New History of Parhae* (London: Global Oriental Ltd. 2012).

### Articles

- Kim Jung-bae, “Bronze Artifacts in Korea and their Cultural-Historical Significance,” in Pearson, Richard J., ed., *The Traditional Culture and Society of Korea: Prehistory*, Occasional Papers of the Center for Korean Studies, No. 3, University of Hawaii, Honolulu, HI., 1975.

- Sections on late Koryŏ Neo-Confucianism in Lee, Peter H., ed., *Sourcebook of Korean Tradition* (New York: Columbia University Press, 1993)
- Kang Man-gil, "Korean Modern and Contemporary History and the 'Minjung,'" in Wells, Kenneth, ed., *South Korea's Minjung Movement: The Culture and Politics of Dissidence* (Honolulu: University of Hawaii Press, 1995).
- "Chumong" and "Prayer to the Steamer God" from Sŏ Taesŏk, ed., *Han'guk ūi sinhwa* in Peter H. Lee and Sŏ Taesŏk, eds., *Myths of Korea* (Seoul: Jimoondang International, 2000).
- Selections from *Naehun* (Instructions for Women) in Yong-ho Ch'oe and Wm. T. de Bary, eds., *Sources of Korean Tradition*, volume 2 (New York: Columbia University Press, 2000).
- "Prince Hodong" and five other selections from the *Munhŏn sŏrhwa* for Peter H. Lee, ed., *Oral Literature of Korea* (Seoul: Jimoondang International, 2005).
- Lim Kihwan, "The Interstate Order of Ancient Northeast Asia: Focusing on the 4<sup>th</sup>-7<sup>th</sup> Centuries," *Journal of Northeast Asian History* 4-1 (2007). With Dennis Lee.
- Kim Taesik, "Koguryŏ and Kaya: Contacts and Consequences," *Journal of Northeast Asian History* 4-1 (2007). With Dennis Lee.
- Lee Sungshi, "Koguryŏ Diplomacy toward the Wa: Foreign Policy Strategy and the Situation in Northeast Asia," *Journal of Northeast Asian History* 4-1 (2007). With Howard Kahm.
- Jung Woonyong, "Aspects of the Relations between Koguryŏ and Silla," *Journal of Northeast Asian History* 4-1 (2007). With Hyung-Wook Kim.
- Yi Kok, "A Censor Requests A Prohibition of the Seizing of Maidens," with introduction, in JaHyun Kim Haboush, ed., *Epistolary Korea: Letters in the Communicative Space of the Chosŏn* (New York: Columbia University Press, 2009).
- Yoon Seon Tae, "Village Society and the System of Local Governance in the Unified Silla Period: Based on Analysis of the Silla Village Documents," in Richard McBride, ed., *State and Society in Middle and Late Silla* (Honolulu: University of Hawaii Press, 2011)
- Lee Kidong, "Political and Social Factors in the Fall of Silla," by Lee Kidong, in Richard McBride, ed., *State and Society in Middle and Late Silla* (Honolulu: University of Hawaii Press, 2011)

## EDITORIAL ACTIVITIES

- Area Co-editor for Korea, *Guide to Historical Literature* (Chicago: American Historical Association, 1994).
- Member, John Whitney Hall book prize committee, 1995.
- Co-editor, *Journal of Korean Studies*, 1995-2009.
- Contributor for English publications, *Han'guksa yŏn'gu nonjŏ ch'ong mongnok* (Bibliography of Korean History) (Seoul: Han'guksa yŏn'guhoe, 1996).
- Member, Editorial Board, *Acta Koreana*, 1996-now.
- Member, Editorial Board, *International Journal of Korean History*, 2000-now.
- Member, Editorial Board, *Han'guksa yŏn'gu*, 2002-2005, 2007-2010.
- Associate Editor, *Journal of Inner and East Asian Studies*, 2004-2006.
- Associate Editor, *Journal of Northeast Asian History*, 2007-2012.
- Editor for history series, Academy of Korean Studies project on translation of Korean classics, 2008-now.
- Editor in chief, *International Journal of Korean History*, 2010-2022.
- Member, Editorial Board, Seoul-California Series in Korean Studies, Institute for International Studies, UC Berkeley, 2010-2013.
- Co-Editor in Chief, English language translation of the *Koryŏsa*, Kukhak yŏn'guwŏn, Yonsei University, Seoul Korea, 2017-now.
- Member, Editorial Board, *Revista Internacional de Estudios Asiaticos*, 2021-



#### AWARDS/HONORS RECEIVED

Selected to give Stanley Spector Memorial Lecture, Washington University at St. Louis, March 2003.

Selected as Haley Distinguished Professor in East Asian Studies, Arizona State University, November 2009.

Selected as Korea Foundation Prize recipient, December 2009.

Selected as Manhae Grand Prize recipient for academics, August 2010.

Selected to give Trina Gillete Memorial Lecture, Portland State University, May 2014.

Selected as Yongjae Award recipient, Yonsei University, March 2017.

**CERTIFICATE OF SERVICE**

I hereby declare under penalty of perjury under the laws of the United States of America that on this date, the foregoing document was filed electronically with the Court and thus served simultaneously upon all counsel of record.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 14, 2023.



---

Kristine Nicolas